

Ashdown Project
Sylvia Underground Molybdenum Mine

Environmental Assessment
October 2006

APPENDIX 2

Temporary & Seasonal Closure Strategy

APPENDIX 2 –TEMPORARY OR SEASONAL CLOSURE STRATEGY

No seasonal or temporary closure is contemplated by GPMI. For the purposes of this plan, a “temporary closure” is defined as a period of 90 consecutive days where no ore is mined or processed. The project will operate year round, including mining and processing. However, if a seasonal or temporary closure is required, based on weather conditions, mechanical issues, and/or decisions by the operator to prematurely shut down the operation, the following seasonal closure strategy will be maintained:

Processing / Milling Facility (Located on Fee Land)

- If the temporary closure definition occurs, GPMI will notify the BLM and NDEP-BMRR in writing of a planned temporary closure.
- The mill facility and tailings pond area fenced in area will be secured and locked.
- At no time will the facility be left totally unattended while in operation or temporary closure. A security guard will monitor the site to protect the facility, public safety, and insure no wildlife or livestock venture into the millsite or tailings pond areas.
- No discharges are authorized from the tailings pond containment area during temporary or permanent closure.
- Beginning in late fall, minimum fresh water makeup addition will be made in order to maintain the design tailings pond volume, consistent with stable operations needs.
- The procedure for unexpected shutdown and planned shutdown are identical, and include:
 - ✓ The tailings pond is designed to contain all solution inflow, plus the unexpected storm, plus a one (1) ft. freeboard. This design standard will be maintained during temporary closure.
 - ✓ Prior to planned shutdown, or as soon as possible after shutdown, all solutions in the total containment system will be pumped into the tailings facility.
 - ✓ GPMI will limit precipitation “inflow” during extended non-operating period by diverting all run-on.
 - ✓ Adequate quantities of hydrogen peroxide and/or hypochlorite sufficient to neutralize accidental cyanide spills will be stored at the facility.
 - ✓ The tailings facility liner will be routinely inspected to ensure total containment integrity.
 - ✓ The system of PVC distribution pipes will also be routinely inspected for leaks (both process fluids and fuel storage area).

- ✓ Acids, sodium cyanide (small quantities for flotation cleaning) and other reactive chemicals will be hauled off-site to a secure facility.
- ✓ Fuel storage tanks will be locked inside the bermed, fenced storage area.
- ✓ Any stored used oil will be transported off-site to an approved facility for treatment and reuse or disposal.
- ✓ Adequate sorbents and oil spill cleanup materials and equipment will be maintained at the site (sorbent, berming material, and fire fighting equipment).
- ✓ The main storm diversion ditch will be inspected to insure total flow conveyance capabilities.

Mining Operations (BLM-Administered Land)

The following temporary closure activities will be implemented by GPMI at the Sylvia minesite:

- The primary interim closure activity for this area will be to close and secure access into the mine. The portal doors will be locked and the ventilation/secondary escape shaft will be covered and locked.
- GPMI will inspect all mine drainage facilities (sump and pumping systems) to insure they are fully operational, and will continue to function properly during this “stand-down” period.
- GPMI will continue to collect and analyze mine drainage water quality to ensure the necessary BLM and NDEP-BMRR monitoring and reporting requirements are met.
- All underground mining equipment will be removed and stored at the Morris millsite.

Other Ancillary Support Facilities and Temporary Closure (Fee and BLM Land)

- GPMI will maintain all road culverts and drainage facilities during the interim shutdown period.
- The waste rock storage site will also be inspected for drainage, stability, and stormwater management needs during this period, including maintenance of all existing facilities.

These activities collectively constitute the temporary closure plan for the Sylvia mine Plan of Operations.